

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAUN PATRICK SULLIVAN,

Defendant.

Cr. 1 - 09 - 10090

18 U.S.C. § 2422(b)

18 U.S.C. § 2253

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Between in or about July, 2008, the exact date being unknown to the Grand Jury, and continuing through on or about July 23, 2009, in the Western District of Tennessee and elsewhere, the defendant,

-----**SHAUN PATRICK SULLIVAN**-----

used, and caused to be used, a facility and means of interstate commerce, that is, a combined computer/telephone system, using interstate "instant messages" and "electronic mail" (e-mail) messages, and a series of long distance telephone conversations between the State of Texas and the State of Tennessee over an interstate telephone system, to knowingly persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce, A.N., a female who was then 13 years of age, to engage in a sexual acts, that is, fellatio, and cunnilingus, such sexual conduct then constituting a prosecutable criminal

offense under Tennessee Code Annotated, Section 39-13-506(c); all in violation of Title 18, United States Code, Section 2422(b).

COUNT 2

FORFEITURE ALLEGATIONS

1. The allegations contained in Count 1 of this Indictment are incorporated by reference as if fully set forth herein.
2. Upon conviction for violating Title 18, United States Code, Section 2422(b), the defendant, **SHAUN PATRICK SULLIVAN**, shall forfeit to the United States any and all right, title, and interest he has in:
 - a. any visual depiction described in Section 2252 of Title 18, United States Code, and any book, magazine, periodical, film, videotape, and other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of the aforesaid statute;
 - b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the aforesaid offenses; and,

c. any property, real or personal, used or intended to be used to commit or to promote the commission of the aforesaid offenses, including but not limited to the following:

1. HTC 8925 cell phone, Serial Number HT840G000416
2. Samsung Black Phone Hex Number A000001700D3AF
3. Motorola Cell Phone, Serial Number STUG3037DF

all pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

FOREMAN

DATE:

August 17, 2009

Asst. Victor L. Dy
UNITED STATES ATTORNEY